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September 5, 2024

VIA ECF ONLY

Hon. Mary Kay Vyskocil
United States District Judge
Southern District Of New York
500 Pearl Street
New York, NY 10007

Re: *Style Stitch, Inc. v. The Avyan Group, LLC*, 1:23-cv-10701-MKV
Request for Extension of Time to File an Amended Complaint

Dear Judge Vyskocil,

We represent Plaintiff Style Stitch, Inc. ("Plaintiff") in the above-captioned action, and write without Defendant The Avyan Group, LLC's ("Defendant") consent to request a 30-day extension of time to file a Second Amended Complaint. The Plaintiff requests this extension of time to complete factual investigation and gather additional materials from the Plaintiff to raise certain jurisdictional facts for the contemplated amended complaint as directed in the Court's Order dated August 7, 2024, denying Defendant's motion to dismiss the amended complaint (DE #20, "the Order").

The Order provides that Plaintiff is entitled to discovery of jurisdictional facts regarding Defendant. Plaintiff is awaiting additional information relating to the specific Port in New York used by the Defendant in furtherance of its business that relates to jurisdictional allegations for the Second Amended Complaint. Plaintiff's request for a brief extension does not impact any other deadlines.

This is the first request by the Plaintiff to extend the time to file a pleading. We respectfully request the Court grant Plaintiff's request to complete jurisdictional discovery within the next 30 days before Plaintiff files the Second Amended Complaint by October 7, 2024.

Respectfully submitted,
/s/ Kalpana Nagampalli
Kalpana Nagampalli